

## State Water Resources Control Board

February 3, 2017

(Via email and Certified Mail)  
**CERTIFIED MAIL**  
**NO. 7015 1520 0001 8017 1108**

Mr. Karl Vogeley  
Fleet Manager  
City of Glendale Public Works  
541 West Chevy Chase Drive  
Glendale, California 91204  
[kvogeley@glendaleca.gov](mailto:kvogeley@glendaleca.gov)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT GLENDALE WATER AND POWER – UOC (FLEET SHOP,  
TRANS SHOP, AND WAREHOUSE), 800 AIR WAY, GLENDALE**

Dear Mr. Vogeley:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 26, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit</b> – The operating permit onsite had an expiration date of December 31, 2016.	All	January 1, 2017	Ongoing	H&SC 25284(a)
2	<b>Failure to Maintain Facility Information Form A</b> – The UST Facility Operating Permit Application in CERS (Form A) lists self-insured, however, the Chief Financial Officer (CFO) letter and certificate of financial responsibility states Underground Storage Tank Cleanup Fund is being used.	All	January 26, 2017	Ongoing	23 CCR 2711(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	<b>Failure to Maintain Financial Responsibility</b> – The Certificate of Financial Responsibility form is incorrect and must be updated to list the CFO letter in the mechanism type column, in addition to the existing State UST Cleanup Fund.	All	January 26, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
4	<b>Failure to Maintain Plot Plan/Site Map</b> – The site map in CERS fails to show the piping configuration for all four tanks.	All	January 26, 2017	Ongoing	23 CCR 2711(a)(8)
5	<b>Failure to Maintain Monitoring Plan</b> – The Monitoring Plan in CERS states that electronic line leak detectors are present. However, at the time of inspection, all three fueling tanks had VMI mechanical line leak detectors installed.	Tanks 1, 2, and 3	January 26, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)
6	<b>Failure to Meet Designated Operator (DO) Inspection Requirements</b> – The alarm history reports or logs were not attached to each monthly DO inspection record. The DO form used does not document all actions taken in response to alarms.	All	January 1, 2016	Ongoing	23 CCR 2715(c)(1)
7	<b>Failure to Meet Spill Containment Requirements</b> – The waste oil spill container does not meet the minimum five gallon capacity requirement.	Waste Oil	January 26, 2017	Ongoing	23 CCR 2635(b)(1)
8	<b>Failure to Tag Monitoring Equipment</b> – The VMI line leak detector did not have a certification tag. This violation was corrected onsite during the inspection.	Tank 2	January 26, 2017	January 26, 2017	23 CCR 2638(f)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Glendale City Fire Department within thirty (30) days from the date of this letter. Have your DO make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

**State Water Board**

Mr. Joseph Lovesee  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
801 K Street, Suite 2300  
Sacramento, California 95814  
[joseph.lovesee@waterboards.ca.gov](mailto:joseph.lovesee@waterboards.ca.gov)

**Local CUPA**

Mr. Thomas Marchant  
Fire Battalion Chief  
Glendale City Fire Department  
421 Oak Street  
Glendale, California 91208  
[tmarchant@glendaleca.gov](mailto:tmarchant@glendaleca.gov)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel", with a stylized flourish at the end.

Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: *(via email only)*

Mr. Thomas Marchant  
Fire Battalion Chief  
Glendale City Fire Department  
[tmarchant@glendaleca.gov](mailto:tmarchant@glendaleca.gov)